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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	Case No.: 2:16-cr-216-KJD-VCF
)	
Plaintiff,)	<u>STIPULATION TO CONTINUE</u>
)	<u>DEADLINE FOR RESPONSE AND</u>
vs.)	<u>REPLY TO MOTION TO</u>
)	<u>SUPPRESS EVIDENCE</u>
LONNY DITIRRO,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the United States of America, and Ryan Norwood, counsel for Lonny Ditirro, that the Response to the Motion to Suppress Evidence deadline currently set for November 10, 2016, be continued and reset to December 2, 2016; and that the Reply to the Motion to Suppress Evidence deadline be set to December 16, 2016. The parties will also be filing a motion to continue trial dates to accommodate these new deadlines.

This Stipulation is entered into for the following reasons:

1. Counsel for the Government was recently hospitalized after emergency surgery, which delayed the ability to adhere to the

1 currently set schedule.

2 2. Counsel for the Government will be trial on November 14, 2016 in
3 *United States v. Fuechtener*. Accordingly, counsel for the Government
4 has been diligently preparing for trial and is unable to adhere to the
5 currently set schedule.

6 3. Counsel for the Government made contact with defendant's counsel
7 who advised he did not object to the continuance.

8 4. The defendant is in custody, but does not object to a continuance of
9 the deadline.

10 5. The additional time requested herein is not sought for purposes of
11 delay, but to allow for counsel for the Government to file the response
12 taking into account due diligence and unforeseen delays in obtaining
13 the hearing transcripts.

14 6. This is the first request to extend the objection to the report and
15 recommendation deadline.

16 DATED this 10th day of November, 2016.

17 DANIEL G. BOGDEN,
18 United States Attorney

RYAN NORWOOD, ESQ.

19 By: /s/Elham Roohani
20 ELHAM ROOHANI
21 Assistant United States Attorney

By: /s/Ryan Norwood
22 RYAN NORWOOD, ESQ.
23 Counsel for Lonny Ditirro

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	Case No.: 2:16-cr-216-KJD-VCF
)	
Plaintiff,)	<u>ORDER ON STIPULATION</u>
)	
vs.)	
)	
LONNY DITIRRO,)	
)	
Defendant.)	

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

1. Counsel for the Government was recently hospitalized after emergency surgery, which delayed the ability to adhere to the currently set schedule.
2. Counsel for the Government will be trial on November 14, 2016 in *United States v. Fuechtener*. Accordingly, counsel for the Government has been diligently preparing for trial and is unable to adhere to the currently set schedule.
3. Counsel for the Government made contact with defendant's counsel who advised he did not object to the continuance.
4. The defendant is in custody, but does not object to a continuance of the deadline.
5. The additional time requested herein is not sought for purposes of delay, but to allow for counsel for the Government to file the response taking into account due diligence and unforeseen delays in obtaining the hearing transcripts.

THEREFORE, FOR GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the Response to the Motion to Suppress Evidence deadline is vacated reset to December 2, 2016; and that the Reply to the Motion to Suppress Evidence deadline is set to December 16, 2016.

Car. Fiedler

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